

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|--------------------------|---|------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. S1-4:15CR00441 CDP |
| |) | |
| TERRANCE WILSON, |) | |
| a/k/a "Mutt," and |) | |
| DONALD STEWART, |) | |
| a/k/a "O.G.," |) | |
| |) | |
| Defendants. |) | |

**GOVERNMENT'S MOTION FOR LEAVE TO FILE A SEALED DOCUMENT AND
FOR LEAVE TO FILE A DOCUMENT IN EXCESS OF FIFTEEN PAGES**

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Dean R. Hoag and Michael A. Reilly, Assistant United States Attorneys for said District, and for its motion for its motion for leave to file a sealed document and for leave to file a document in excess of fifteen pages, states as follows:

1. The United States has prepared a pretrial memorandum that contains sensitive information that may affect the safety of cooperating witnesses. The Court has previously entered a protective order in this violent organized crime case. (Doc. # 91). This is an organized crime case with multiple murders, both charged and uncharged, and the United States has articulable concerns for witness safety. Uncharged coconspirators have previously been convicted of killing a witness in state court.

2. The memorandum also contains significant, sensitive background information related to the defendants.

3. Based upon the totality of the circumstances, the United States requests leave to file the document under seal.

4. Due to the breadth of the evidence in the case, the United States requests leave to file a document in excess of fifteen pages. The United States believes the length of the document will further judicial economy.

WHEREFORE, the United States request leave to file the document under seal and for leave to file a document in excess of fifteen pages.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Michael A. Reilly
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MICHAEL A. REILLY, #43908 MO
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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Michael A. Reilly
DEAN R. HOAG, #23843MO
MICHAEL A. REILLY, #43908MO
Assistant United States Attorneys